

STATEMENT OF BASIS (AI No. 9596)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0075981 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: International Matex Tank Terminals
IMTT-Avondale
5450 River Road
Avondale, Louisiana 70094

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: April 24, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Modification of a Louisiana Pollutant Discharge Elimination System (LPDES) permit to move the sampling point for the sanitary discharge from Outfall 001 to four separate internal outfalls (at the point of discharge from the individual sewage treatment plants) and the sampling point of the boiler blowdown discharge from Outfall 001 to a separate internal outfall (at the point of discharge from the gas powered boilers).

B. LPDES permit - LA0075981

LPDES permit effective date: June 1, 2004

LPDES permit expiration date: May 31, 2009

C. Date Modification Request Received: July 29, 2005

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - bulk liquid storage and transfer facility

IMTT-Avondale is an existing private, for-hire bulk liquids storage terminal. Tank washing is performed onsite, but tank washwaters and waters used for maintenance procedures are transported off site for storage and treatment. IMTT-Avondale conducts no manufacturing operations. A modification request was received on July 29, 2005, to move the sampling point for the sanitary discharge from Outfall 001 to four separate internal outfalls (at the point of discharge from the individual sewage treatment plants). An additional modification request was received on March 15, 2006, to move the sampling point of the boiler blowdown discharge from Outfall 001 to a separate internal outfall (at the point of discharge from the gas powered boilers).

B. FEE RATE

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 4226

C. LOCATION - 5450 River Road, Avondale, Jefferson Parish
Latitude 29°55'05", Longitude 90°11'44"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: the intermittent discharge of stormwater runoff from the entire facility, boiler condensate, kitchenette wastewater, and previously monitored hydrostatic test wastewater, treated sanitary wastewater, and boiler blowdown.

Treatment: oil/ water separator

Location: at the point of discharge from the ditch immediately downstream of the oil and water separator located east of Tank 103 prior to combining with other waters (Latitude 29°54'35", Longitude 90°11'57")

Flow: intermittent, 1.7105 MGD (average)

Discharge Route: unnamed ditch thence to Main Canal thence to Lake Cataouatche

Outfall 301

Discharge Type: treated sanitary wastewater

Treatment: sewage treatment plant (aeration, chlorination)

Location: at the point of discharge from sewage treatment plant servicing the Carder Building located on the south side of the terminal (Latitude 29°55'05", Longitude 90°11'44")

Flow: 400 gpd

Discharge Route: through Outfall 001 to an unnamed ditch thence to Main Canal thence to Lake Cataouatche

Outfall 401

Discharge Type: treated sanitary wastewater

Treatment: sewage treatment plant (aeration, chlorination)

Location: at the point of discharge from sewage treatment plant servicing the plant office located on the south side of the terminal (Latitude 29°55'05", Longitude 90°11'44")

Flow: 140 gpd

Discharge Route: through Outfall 001 to an unnamed ditch thence to Main Canal thence to Lake Cataouatche

Outfall 501

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant (aeration, chlorination)
Location: at the point of discharge from sewage treatment plant
servicing the Sanchez Building located on the south side
of the terminal (Latitude 29°55'05", Longitude
90°11'44")
Flow: 100 gpd
Discharge Route: through Outfall 001 to an unnamed ditch thence to Main
Canal thence to Lake Cataouatche

Outfall 601

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant (aeration, chlorination)
Location: at the point of discharge from sewage treatment plant
servicing the office building located on the south side
of the terminal (Latitude 29°55'05", Longitude
90°11'44")
Flow: 100 gpd
Discharge Route: through Outfall 001 to an unnamed ditch thence to Main
Canal thence to Lake Cataouatche

Outfall 701

Discharge Type: boiler blowdown
Treatment: none
Location: at the point of discharge from the gas powered boilers
located on the south side of the terminal
(Latitude 29°55'05", Longitude 90°11'44")
Flow: intermittent
Discharge Route: through Outfall 001 to an unnamed ditch thence to Main
Canal thence to lake Cataouatche

4. RECEIVING WATERS

STREAM - through Outfall 001 thence to an unnamed ditch thence to Main
Canal thence to Lake Cataouatche

BASIN AND SEGMENT - Barataria Basin, Segment 020501

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

An most recent inspection performed at the facility on September 12, 2005, was done a result of the Hurricane Katrina Response. The findings were as follows: The company handles various types of vegetable oils. Darryl Daigs advised that empty tanks floated and some were damaged by the storm. There was ample evidence of a possible spill involving some type of vegetable or tropical oil. They were trying to clean up with pumps, hoses and dumpsters. The terminal was semi-operational. The overall condition was somewhat compromised especially drainage pathways and the oil/water separator. A follow-up inspection was suggested.

B. DMR Review/Excursions

DMR's were reviewed for the last two years. All DMR's were submitted in accordance with the permit. The following excursions were noted:

| <u>Date</u> | <u>Parameter</u> | <u>Outfall</u> | <u>Reported Value</u> | <u>Permit Limits</u> |
|-------------|------------------|----------------|-----------------------|----------------------|
| 6/05 | Fecal Coliform | 001 | 45,000 col | 400 col/100 mL |
| 4/05 | Fecal Coliform | 001 | >60,000 col | 400 col/100 mL |
| 2/05 | Fecal Coliform | 001 | 43,000 col | 400 col/100 mL |
| 1/05 | Fecal Coliform | 001 | 4,300 col | 400 col/100 mL |
| 11/04 | Fecal Coliform | 001 | >17,000 col | 400 col/100 mL |
| 10/04 | Fecal Coliform | 001 | >60,000 col | 400 col/100 mL |
| 10/04 | TSS | 001 | 278 mg/L | 45 mg/L |
| 8/04 | Fecal Coliform | 001 | >60,000 col | 400 col/100 mL |
| 7/04 | Fecal Coliform | 001 | >60,000 col | 400 col/100 mL |
| 7/04 | TSS | 001 | 1,260 mg/L | 45 mg/L |

7. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020501 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

8. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the

National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

9. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

10. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for International Matex Tank Terminals

1. **Outfall 001** - the intermittent discharge of stormwater runoff, boiler condensate, kitchenette wastewater, and previously monitored hydrostatic test wastewater, treated sanitary wastewater, and boiler blowdown. (estimated flow is 1.7105 MGD).

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max (mg/l unless stated) | <u>Reference</u> |
|------------------|--|--|
| Flow (MGD) | Report:Report | LAC 33:IX.2361.I.1.b |
| Oil & Grease | ---:15 | BPJ; previous LWDPS permit; LDEQ Stormwater Guidance; * |
| TOC | ---:50 | BPJ; previous LWDPS permit; LDEQ Stormwater Guidance; * |
| Total Phenols | ---:0.1 | BPJ; previous LWDPS permit |
| pH min/max(su) | 6.0:9.0 (min/max) | BPJ; previous LWDPS permit; LDEQ Stormwater Guidance;* |

Treatment: oil/water separator

Monitoring Frequency: once/week for flow; once/month for oil and grease, TOC and pH; once/quarter for Total Phenols

Limits Justification: The TOC and Oil and Grease limits are based on the 1994 LWDPS permit for Outfall 001 by BPJ. Those limits, which were established in 1994, were based on LDEQ Stormwater Guidance, similar permits and BPJ of the permit writer. The facility's bulk storage of creosote prompted a 1995 modification to the 1994 LWDPS that established a Total Phenols limit by BPJ. TSS, BOD, and Fecal Coliform are no longer being monitored at the outfall as they will be monitored at the point of discharge from the respective internal outfall.

2. Outfalls 301, 401, 501, and 601 - treated sanitary wastewater (estimated flow varies)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Weekly Avg. (mg/l) | <u>Reference</u> |
|------------------|--|--------------------------------------|
| Flow | ---:Report | |
| BOD | ---:45 mg/L | LPDES General Permit LAG480000 (BPJ) |
| TSS | ---:45 mg/L | LPDES General Permit LAG480000 (BPJ) |
| Fecal Coliform | ---400/100mL | LPDES General Permit LAG480000 (BPJ) |

Treatment: sewage treatment plant (aeration, chlorination)

Monitoring Frequency: 1/6 months for all parameters at the point of discharge from the sewage treatment plants.

Limits Justification: Light Commercial Facilities General Permit LAG480000, Schedule A.

3. Outfall 701 - boiler blowdown (estimated flow is intermittent)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max. (mg/l) | <u>Reference</u> |
|------------------|---|--------------------------------------|
| Flow | ---:Report | |
| TSS | 30:100 mg/L | LPDES General Permit LAG480000 (BPJ) |
| Oil & Grease | ---:15 mg/L | LPDES General Permit LAG480000 (BPJ) |

Treatment: sewage treatment plant (aeration, chlorination)

Monitoring Frequency: 1/month for all parameters at the point of discharge from the gas powered boilers.

Limits Justification: Light Commercial Facilities General Permit LAG480000, Schedule G. Temperature is not included in the outfall parameters as the distance from the internal discharge point is far enough from the receiving waterbody to allow for ample cooling of the boiler blowdown. Additionally, as per the facility, the volume of discharge from this outfall is only a small portion of the total makeup of Outfall 001.

303(d)/TMDL WATERBODIES

Subsegment 020501 of the Barataria Basin is not listed on LDEQ's Final 2004 303(d) List as impaired. However, Subsegment 020501 was previously listed for organic enrichment/low DO, nitrates, and phosphorus for which the below TMDL has been developed. The Department of Environmental Quality reserves the

right to impose more stringent discharge limitation and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL has been established for subsegment 020501:

The St. Charles Parish Canals and Bayous in Segment 0205 TMDL for Biochemical Oxygen-demanding Substances was completed March 2004. No point sources were included in this TMDL because they are small and far away from the modeled waterbody. This TMDL states that the non-conservative behavior of dissolved oxygen allows many small or remote point source dischargers to be assimilated by their receiving waterbodies before they reach the modeled waterbody. These dischargers are said to have very little to no impact on the modeled waterbody and are not included in the model and are not subject to any reductions based on this TMDL. However, limits for BOD₅ are being placed on Outfalls 301, 401, 501, and 601 to further protect against impairments for this waterbody. This facility is not expected to discharge nitrates or phosphorus at a level which would cause or have the reasonable potential to cause or contribute to an excursion above any present state water quality standard.